UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

No. 21 CR 640

v.

Judge Matthew F. Kennelly

KARL TAYLOR

UNOPPOSED MOTION TO ALLOW TRANSPORT OF CERTAIN EVIDENCE ITEMS

The UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully moves this Court to allow the transport of firearm evidence items into the Dirksen Federal Courthouse. In support thereof, the government states as follows:

- 1. As part of the trial in this case, the government intends to introduce evidence of a firearm and ammunition, namely a Remington, Model R51, 9mm caliber semiautomatic pistol bearing serial number 0026796R51, along with associated ammunition.
- 2. The firearm will be unloaded and secured such that it is incapable of firing.
- 3. The Bureau of Alcohol, Tobacco, Firearms and Explosives will present this firearm to the U.S. Marshals Service for inspection prior to July 18, 2022, the start of the trial in this case.
- 4. On July 8, 2022, the government discussed this motion with defense counsel and defense counsel did not oppose the government's motion.

For the reasons set forth above, the government respectfully requests that this Court enter an order allowing representatives of the Bureau of Alcohol, Tobacco, Firearms and Explosives to carry the above-named firearm and ammunition into Courtroom 2103 at the Dirksen Federal Courthouse for trial.

Respectfully submitted,

JOHN R. LAUSCH, JR. United States Attorney

By: /s/ Richard M. Rothblatt
RICHARD M. ROTHBLATT
MISTY N. WRIGHT
Assistant U.S. Attorneys
219 South Dearborn Street, 5th Floor
Chicago, Illinois 60604
(312) 353-5300